

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SENIOR HEALTH INSURANCE COMPANY :		
OF PENNSYLVANIA :		
Plaintiff :	Case No. 1:18-cv-06658-JSR	
v. :		
BEECHWOOD RE LTD., et al :	ECF CASE	
Defendants :		
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**NOTICE OF MOTION FOR LEAVE TO AMEND THE
FIRST AMENDED COMPLAINT BY PLAINTIFF
SENIOR HEALTH INSURANCE COMPANY OF PENNSYLVANIA**

PLEASE TAKE NOTICE that, the Declaration of R. Brian Seibert dated December 14, 2018, with attached exhibits and the accompanying Memorandum of Law submitted herewith, Plaintiff Senior Health Insurance Company of Pennsylvania (“SHIP”), by and through its undersigned counsel, DLA Piper LLP (US), pursuant to Federal Rule of Civil Procedure 15(a)(2), hereby moves this Court, before the Honorable Jed S. Rakoff, for an Order granting leave to amend its First Amended Complaint to assert certain additional claims against the Defendants, and for such other and further relief as the Court deems just and proper. SHIP filed its First Amended Complaint on December 14, 2018, as permitted by the Court’s December 6, 2018 Opinion and Order. [Dkt 72].

Respectfully Submitted,

/s/ R. Brian Seibert

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